

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

QUALCOMM Incorporated

Petition for Declaratory Ruling

WT Docket No. 05-7

To: The Chief, Mobility Division, Wireless Telecommunications Bureau

REPLY COMMENTS OF PAPPAS SOUTHERN CALIFORNIA LICENSE, LLC

Pappas Southern California License, LLC ("Pappas"), by its undersigned counsel and in accordance with the Commission's *Order* extending the date for filing Reply Comments in the captioned proceeding,¹ hereby respectfully submits this Reply to the Comments submitted by various parties in response to the Commission's *Public Notice*, "Pleading Cycle Established for QUALCOMM Incorporated Petition for Declaratory Ruling" (the "*Public Notice*").²

Pappas notes that a total of ten comments were filed with the Commission in response to the *Public Notice*. Seven of the commenters – Flarion Technologies, Inc. ("Flarion"), the 700 MHz Advancement Coalition (the "Coalition"), Access Spectrum, LLC ("Access"), Harbor Wireless, L.L.C. ("Harbor"), Corr Wireless Communications, LLC ("Corr"), Motorola, Inc.

¹ DA 05-419, adopted February 14, 2005 and released February 15, 2005 (Chief, Mobility Division, Wireless Telecommunications Bureau).

² DA 05-87, released January 18, 2005 (Chief, Mobility Division, Wireless Telecommunications Bureau).

("Motorola"), and Aloha Partners, L.P. ("Aloha") (Flarion, the Coalition, Access, Harbor, Corr, Motorola, and Aloha are collectively referred to hereinafter as the "Supporting Commenters") – either absolutely or conditionally supported QUALCOMM, Incorporated's ("QUALCOMM's") Petition for Declaratory Ruling (the "Petition") in this proceeding. The remaining three commenters – Pappas, Cox Broadcasting, Inc. ("Cox"), and the Association for Maximum Service Television, Inc., jointly with the National Association of Broadcasters ("MSTV/NAB") (Pappas, Cox, and MSTV/NAB are collectively referred to hereinafter as the "Opposing Commenters"), strongly opposed QUALCOMM's Petition.

Before reviewing some of the specific points made in the various comments, Pappas observes that the comments of the Supporting Commenters, none of which were buttressed by engineering submissions, by and large echo the Petition, without providing any further analysis or additional argument for the Commission's grant of the Petition. The comments of the Opposing Commenters, by contrast, are each supported by a thorough engineering statement detailing flaws in the technical underpinnings of the Petition, and each effectively exposes the fundamental errors and incorrect assumptions underlying the Petition's request for relief. Analyzing each of QUALCOMM's separate requests for declaratory rulings, and demonstrating why the Commission's grant of the Petition would be wholly inconsistent with applicable law, well-established Commission policies, and the public interest, the Opposing Commenters demonstrate conclusively that the Petition should be denied.

The Supporting Commenters superficially recite and rehash the same supposed benefits and the same flawed assumptions set forth in QUALCOMM's Petition: that grant of the Petition would expedite the deployment of new services;³ that the generation of interference to the service populations of incumbent analog television ("TV") and digital television ("DTV") stations in areas that would be affected would only be temporary;⁴ that the use of the methodology set forth in the Commission's Office of Engineering and Technology Bulletin No. 69 ("OET-69")⁵ is appropriate to assess the extent of interference to a TV or a DTV station's service population from a Lower 700 MHz band service provider under Section 27.60 of the Commission's Rules, because OET-69 is "... a recognized standard upon which the Commission has written and with which Commission staff has a good working knowledge...", and because "... it is a standard that the broadcasting community is intimately familiar with, ...";⁶ that the use of a two percent (2%) permissible interference cap to the service populations of affected TV and DTV stations would only have an impact upon a "... small number of broadcast viewers ...,"⁷ and would in fact be less than 2%, because many of those viewers receive their television signals via cable or satellite, rather than over the air, and hence would presumably not be affected;⁸ and that

³ Coalition Comments, p. 3; Aloha Comments, pp. 5-6.

⁴ Coalition Comments, p. 7; Access Comments, p. 4; Harbor Comments, p. 3.

⁵ "Longley-Rice Methodology for Evaluating TV Coverage and Interference."

⁶ Aloha Comments, pp. 2-3.

⁷ Coalition Comments, p. 7.

⁸ Aloha Comments, p. 4; Coalition Comments, p. 8.

the streamlined procedure proposed in QUALCOMM's Petition for reviewing Section 27.60 waiver requests would serve the public interest.⁹

These arguments were all presented in QUALCOMM's Petition and are entirely discredited by the Opposing Commenters.

Expediting New Services. When the Lower 700 MHz spectrum was reallocated, all parties were put on notice that access to that spectrum in a manner other than as sanctioned by Section 27.60 would not be permitted. While the expeditious introduction of new services is generally to be encouraged, protection of incumbent users is one of the most fundamental and well-established principles of communications law and regulation. Moreover, in this specific context, the Commission made it crystal clear that such new services were not to be introduced at the expense of television viewers' access to their local TV and DTV stations. As Cox points out in its Comments, the Commission stated unequivocally that

... all existing analog TV and new DTV stations in the [Lower 700] MHz band would be *fully protected* during the DTV transition period. Thus, it will be necessary for licensees in the reallocated spectrum to protect both analog TV and DTV stations in the [Lower 700] MHz band from interference.¹⁰

⁹ Coalition Comments, pp. 6-7; Access Comments, p. 5; Aloha Comments, pp. 4-5; Corr Comments, pp. 4-5. Corr actually complains about "... the continued presence in the [Lower 700 MHz] band of analog broadcast stations who ... [Corr] had anticipated would be vacating their channels in the mid 2000's." Corr Comments, p. 1.

¹⁰ Cox Comments, p. 3, quoting *Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59)*, Notice of Proposed Rule Making in GN Docket No. 01-74, 16 FCC Rcd. 7278, 7294 (2001) (emphasis added; citation omitted).

As MSTV/NAB's and Cox's Comments separately point out, the Commission is not at liberty suddenly to change that standard of protection for the benefit of the new services offered by sponsors that purchased their spectrum in full awareness of the limitations upon their access to it, under the Administrative Procedure Act, the Communications Act of 1934, as amended, and the Auction Reform Act of 2002, at least not in the absence a new public-notice-and-comment rule making proceeding such as the proceeding that adopted the standard of protection that QUALCOMM now seeks to diminish.¹¹

Temporary Nature of Interference. Cox's Comments cogently point out that in providing for the reallocation of the Lower 700 MHz channels from television broadcasting to services such as those proposed by QUALCOMM and the Supporting Commenters,

... Congress and the Commission adopted their 700 MHz statutes and regulations with the clear understanding that full protection of television viewers in this band necessarily was temporary. At some point, analog television service ends and the Commission will clear broadcast stations from the 700 MHz Band. Qualcomm unreasonably seeks at this stage to justify changes to temporary protection rules on the grounds that they are ... *temporary*.¹²

Pappas wholeheartedly endorses Cox's rebuttal of this tautological "temporariness" argument. The simple fact is that, as MSTV/NAB point out in their Comments, QUALCOMM and the other successful bidders for Lower 700 MHz spectrum were put on notice throughout the pre-auction stage that "... existing broadcast operations, ... will likely remain in operation until

¹¹ MSTV/NAB Comments, pp. 5-8; Cox Comments, pp. 5-6.

¹² Cox Comments, p. 7 (emphasis in original).

the end of the transition to DTV, *which may extend beyond the 2006 target date.*"¹³ Those bidders now wish to change the rules under which they obtained their spectrum and to increase the value of the spectrum that they purchased, by eliminating the clear protections for existing users. Their attempt to do so constitutes an unprecedented encroachment upon the rights of the incumbent television stations and their viewing audiences, and should be and remain unavailing.

OET-69 is an Appropriate Methodology for Assessing Departures from the Requirements of Section 27.60. The simple fact that the OET-69 methodology is familiar to the Commission and to the broadcasting community hardly endorses it as an appropriate tool for measuring the impact of interference caused by QUALCOMM's proposed service to incumbent TV and DTV stations. Nor can the OET-69 methodology credibly be invoked to justify interference to incumbent television stations and their audiences from co-channel or adjacent-channel Part 27 users whose transmitters are located smack in the middle of the affected television station's protected service area. A fundamental assumption upon which OET-69 was constructed to predict coverage and interference at the periphery of the affected station's service area was that the interference sources would be located some distance outside of the protected service contours of the affected station. That is not the case in QUALCOMM's proposal.

¹³ MSTV/NAB Comments, p. 21, quoting *Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59)*, Report and Order in GN Docket No. 01-74, 17 FCC Rcd. 1022, 1047 (2002) (emphasis added). The quoted admonition from the Commission's Report and Order renders hollow Corr's feigned distress that incumbent TV and DTV stations may continue to occupy channels in that band past the "mid-2000s". See footnote 9, *supra*.

The Engineering Statements appended to the Comments of Pappas, MSTV/NAB, and Cox all demonstrate in detail why OET-69 was entirely unintended for – and is simply inappropriate to -- the task to which QUALCOMM would attempt to bend it.¹⁴ Those submissions, prepared by trained and knowledgeable professional electrical engineering consultants, are conclusive, and they stand unrebutted by the bland assurances from the lay attorneys and principals who submitted the Supporting Commenters' comments without a single shred of supportive engineering discussion or analysis.

The 2% Interference Cap Will Result in Interference to Only a "Small Number" of Television Viewers, Not Including Cable Television or Satellite Subscribers. Pappas' Comments pointed out that in Los Angeles, California, where Pappas' analog television station KAZA-TV operates on NTSC Channel 54, one channel below the frequencies upon which QUALCOMM's "MediaFLO" service would operate, 2% of the available viewer population of KAZA-TV would be over 310,000 persons.¹⁵ MSTV/NAB's Comments extrapolate the 2% interference cap proposal to all markets in which an incumbent TV or DTV station operates on Channels 54, 55,

¹⁴ See, e.g., Engineering Statement of Khanna & Guill, Inc., appended to Pappas' Comments, at pp. 5-8; Engineering Statement of Cohen, Dippell and Everist, P.C., appended to MSTV/NAB's Comments, at Section III (pp. 3-10); Engineering Statement of Cohen, Dippell and Everist, P.C., appended to Cox's Comments, at pp. 2-4. The Khanna & Guill, Inc. Engineering Statement appended to Pappas's Comments points out that in granting a waiver of Section 27.60 in *Aloha Partners, L.P.*, DA 05-460, FCC File No. 0001777981, 2005 FCC LEXIS 1156 (released February 18, 2005), the Commission analyzed interference to the incumbent television station not by means of OET-69, but rather by means of the Office of Engineering and Technology Bulletin No. 72, using the "Individual Location Longley-Rice" (or "ILLR") methodology. See Engineering Statement of Khanna & Guill, Inc., appended to Pappas' Comments, at p. 5.

¹⁵ Pappas Comments, pp. 2-3.

or 56, and find that 2% of the aggregate population in all of the markets in which such stations are located would total over 4,000,000 viewers across the United States.¹⁶ These are by no means “small numbers” of viewers.

The Supporting Commenters take false comfort from the fact that a majority of households in the country receives its television signals via cable or satellite, and hence would purportedly not be susceptible to experiencing interference in the reception of co-channel or adjacent-channel television stations from an operator such as QUALCOMM. As was pointed out in the Comments of Pappas¹⁷ and of MSTV/NAB,¹⁸ certain demographic groups that are disproportionately over-represented at the lower end of the socio-economic scale may not be in a position to afford pay television service by means of cable and satellite; yet these viewers, the ones most vulnerable to the loss of access to their local over-the-air television service from operations such as that proposed by QUALCOMM, may be in the most need of such access. Moreover, as Pappas’ Comments point out,¹⁹ it cannot be assumed that all cable subscribers are assured of interference-free reception of the signals of television stations operating on Channels 54, 55, or 56; in situations where a high-powered (*i.e.*, up to 50,000-watt) QUALCOMM transmitter on Channel 55 is sited near a cable television system headend, the subscribers to that cable system may feel the effects of co-channel or adjacent-channel interference experienced at

¹⁶ MSTV/NAB Comments, p. 4, n. 9.

¹⁷ Pappas Comments, pp. 4-5, 7-8.

¹⁸ MSTV/NAB Comments, p. 20.

¹⁹ Pappas Comments, pp. 12-13.

the headend and distributed to those subscribers, notwithstanding that they may reside many miles from the QUALCOMM transmitter and far outside of any zone of predicted over-the-air interference.²⁰

A Streamlined Process for Reviewing Section 27.60 Waiver Requests Would Serve the Public Interest. The Supporting Commenters offer little that is persuasive on this point.

Stretching analogies past their logical breaking point, Aloha's Comments echo QUALCOMM's Petition and cite a completely inapposite Commission decision to adopt a streamlined procedure for reviewing insubstantial station ownership changes²¹ as supporting the proposition that complicated engineering and interference showings relying upon novel applications of methodologies that were developed in different contexts and for different purposes should be fast-tracked through the Commission, to the detriment of viewers of television stations whose access to those stations' signals may become impaired by virtue of a too-hasty review – or a failure to review at all – a flawed request for a waiver of the Section 27.60 interference protection requirements.²² In fact, at least one Supporting Commenter confessed to doubts about the fairness to an adversely-impacted broadcast station from such a streamlined waiver review

²⁰ See also the Khanna & Guill, Inc. Engineering Statement appended to Pappas' Comments, at pp. 5-6.

²¹ *Federal Communications Bar Association's Petition for Forbearance from Section 310(d) of the Communications Act Regarding Non-Substantial Assignments of Wireless Licenses and Transfers of Control Involving Telecommunications Carriers*, 13 FCC Rcd 6293 (1998), cited in Aloha's Comments, pp. 4-5.

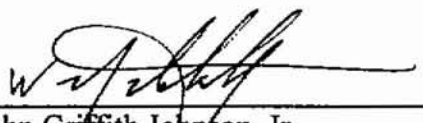
²² See also Pappas Comments, pp. 15-16.

process.²³ On this one point, Pappas concurs with the suggestion of that Supporting Commenter: a Part 27 service provider intending to seek a waiver of Section 27.60 should first present its proposal to the incumbent television station that would be affected, and the parties should be afforded a reasonable period of time in which to determine if they can resolve their differences by private negotiation, prior to presenting to the Commission for resolution an application requesting such a waiver and the affected television station's opposition thereto.²⁴

Respectfully submitted,

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²³ See Coalition Comments, p. 7 ("We recognize that some broadcast stations are likely to protest that this streamlined approach will make it very difficult to mount an offense against a filed OET-69 study showing *de minimis* interference. The Commission can mitigate some of these concerns by requiring that proponents of OET-69 studies serve the broadcast station affected.")

²⁴ *Id.* ("As a practical matter, though, we imagine that the 700 MHz licensee will have been in discussions with the affected station long before the filing of the engineering study.")

APPENDIX A

Engineering Statement of Khanna & Guill, Inc.

**ENGINEERING STATEMENT
ON BEHALF OF
PAPPAS SOUTHERN CALIFORNIA LICENSE, LLC
IN SUPPORT OF REPLY COMMENTS
RE: PETITION FOR DECLARATORY RULING FILED BY
QUALCOMM INCORPORATED
MARCH 2005**

This engineering statement has been prepared on behalf of Pappas Southern California License, LLC ("Pappas"), licensee of analog TV station KAZA-TV, Avalon, California, in support of its reply comments re: Petition for Declaratory Ruling ("Petition") filed by Qualcomm Incorporated ("Qualcomm"). Qualcomm has filed this Petition requesting the Commission to rule that the OET Bulletin 69 methodology (Longley-Rice Methodology for Evaluating Coverage and Interference) be accepted to demonstrate compliance with Section 27.60 of its rules. Qualcomm has also proposed that 2% interference caused by the Lower 700 MHz Band users to the incumbent TV stations be considered acceptable.

The National Association of Broadcasters ("NAB") and the Association For Maximum Service Television, Inc. ("MSTV") have filed joint comments and informal objection to a grant of the Petition. Cox Broadcasting, Inc. ("Cox") has also filed comments in opposition to the Petition. Pappas agrees with the comments filed by NAB/MSTV and Cox that the OET Bulletin 69 methodology was primarily adopted by the Commission to make allotment and assignment of TV channels for digital TV stations, and its use for other services is not appropriate without a thorough rule making process. The major distinction between (i) any interference that may exist between TV stations operating on co-channels and adjacent channels, and (ii) the potential of interference caused by the Qualcomm service is that Qualcomm's multiple transmitters will be located within the TV stations' service areas. Part 27 interference rules were developed for Lower 700 MHz service transmitters operating outside of the protected service area of co-channel and adjacent-channel TV stations. According to Part 27

interference rules, the appropriate D/U ratios are to be evaluated at the boundary, rather than inside, a TV station's service area.

TV stations require only one antenna site, unlike Qualcomm's service which would require several transmitter sites. TV stations' sites are normally situated in specific areas (sometimes referred to as antenna farms) of the community, e.g., Mount Wilson near Los Angeles, California, since TV stations require tall towers or higher elevations to provide "shadow-free" service to distant areas. Furthermore, TV stations that operate on the same channels or adjacent channels are located many miles away from each other. The Commission has also allotted new TV channels for digital TV operation several hundred miles away from co-channel TV stations. In some cases, adjacent TV channels have been allotted for operation from the same site in order to minimize the potential for interference between adjacent channel TV operations. Qualcomm's proposed service would involve operation of several transmitters within a TV station's service area, which presents a totally different interference environment than the current and proposed TV service. This is also evident by the Wireless Telecommunications Bureau's analysis of Aloha Partners' proposal, where the Bureau considered it appropriate to use different parameters to evaluate the potential of interference to TV station KWBA. The Wireless Bureau used an F(90,90) probability level for the availability of TV signals within a station's Grade B contour. This procedure is different than the OET Bulletin 69 methodology. In addition, the Wireless Bureau computed Aloha's interfering signal level based upon free-space propagation. The Wireless Bureau also applied a 10 dB factor for signal attenuation to adjust for penetration of structures within which TV receivers would be located. Such procedures are not part of the OET

Bulletin 69 methodology, and its application would have provided totally different results than those arrived at by the Wireless Bureau in the Aloha case.

Therefore, Pappas believes that adoption of OET Bulletin 69 or any other methodology would require a full review and discussion through a rule making process in order to determine whether its use is appropriate for other services such as those proposed in the Lower 700 MHz band in addition to the current TV service.

Pappas has reviewed the comments filed by the 700 MHz Advancement Coalition ("Coalition"). Pappas believes the Coalition's example with regard to the numbers of viewers which may be affected by the proposed 700 MHz service is misleading. The Coalition assumes a TV viewing market consisting of 100,000 people and estimates only 300 viewers would be impacted by the new 700 MHz service. The Coalition also assumes that 85% of viewers receive cable television or satellite television service and only 15% receive their signal over the air, citing a Nielsen Media Research statement that "14.75 percent of US households rely *exclusively* on over-the-air television for video programming." (emphasis added). The Coalition misinterprets Nielsen's statement by ignoring the word "exclusively." The fact is that many households own several TV receivers, and all of them are not normally connected to the cable or to the satellite. In addition, as was demonstrated in Pappas' comments, cable headends can be also impacted by the Qualcomm service, thereby affecting a larger numbers of viewers than indicated by the OET Bulletin 69 studies.

The attached Tables I & II indicate that there are currently 42 analog and 50 digital TV stations licensed or authorized to operate on TV Channels 54, 55, or 56.

Tables I & II also provide the estimated populations (2000 census) within the Grade B or noise limited contours of these TV stations. Except for four markets where TV stations currently operate or are authorized to operate on Channels 54, 55, or 56, the number of people within the Grade B or the noise limited contours is much greater than 300,000 people. Tables I & II also show 2% of the people within each market. These figures are much larger than the example provided by the Coalition. As a matter of fact, as indicated in the joint comments of NAB/MSTV¹, over 4 million people nationwide could be potentially impacted, if the 2% interference criterion were to be adopted.

Therefore Pappas strongly opposes the adoption of a 2% interference standard and supports the NAB/MSTV comments with regard to their opposition to two percent interference as being considered *de minimis*. Pappas believes it is not appropriate to apply a two percent interference criterion for the proposed Qualcomm service, since that criterion was primarily adopted to provide flexibility to construct DTV stations more quickly and to provide DTV service to a large numbers of viewers.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

24 March 2005

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¹ Joint Comments of NAB and MSTV at Page 4 and footnote 9.

TABLE I
POPULATIONS WITHIN GRADE B CONTOURS
OF TV STATIONS CURRENTLY OPERATING
OR AUTHORIZED TO OPERATE ON TV CHANNELS 54, 55, OR 56
MARCH 2005

| <u>CALL/(CHANNEL)</u> | <u>CITY/STATE</u> | <u>POPULATION</u> 2000 CENSUS | <u>2% INTERFERENCE</u> |
|-----------------------|-------------------|----------------------------------|------------------------|
| WZDX(54) | Huntsville, AL | 960,442 | 19,209 |
| KAJB(54) | Calipatria, CA | 307,198 | 6,144 |
| KAZA-TV(54) | Avalon, CA | 15,533,550 | 310,671 |
| KTEH(54) | San Jose, CA | 6,109,903 | 122,198 |
| WFXG(54) | Augusta, GA | 629,841 | 12,597 |
| WXTX(54) | Columbus, GA | 563,452 | 11,269 |
| WCVN-TV(54) | Covington, KY | 1,716,692 | 34,334 |
| WUPL (54) | Slidell, LA | 1,449,233 | 28,985 |
| WNUV(54) | Baltimore, MD | 7,446,697 | 148,934 |
| WTLJ(54) | Muskegon, MI | 1,240,958 | 24,819 |
| WTBY-TV(54) | Poughkeepsie, NY | 6,082,248 | 121,645 |
| WQLN(54) | Erie, PA | 479,351 | 9,587 |
| WCCV-TV(54) | Arecibo, PR | 3,528,853 | 70,577 |
| WPXK(54) | Jellico, TN | 1,303,966 | 26,079 |
| KNVA(54) | Austin, TX | 1,603,870 | 32,077 |
| KCEB(54) | Longview, TX | 532,414 | 10,648 |
| WBPG(55) | Gulf Shores, AL | 942,316 | 18,846 |
| WACX(55) | Leesburg, FL | 2,758,536 | 55,171 |
| WSST-TV(55) | Cordele, GA | 88,864 | 1,777 |
| WRSP-TV(55) | Springfield, IL | 666,292 | 13,326 |
| WFFT-TV(55) | FT. Wayne, IN | 707,828 | 14,157 |
| WLNY(55) | Riverhead, NY | 3,837,004 | 76,740 |
| WYPX(55) | Amsterdam, NY | 967,532 | 19,351 |
| WLNY(55) | Riverhead, NY | 3,837,004 | 76,740 |
| WBNX-TV(55) | Akron, OH | 3,707,652 | 74,153 |
| WWWB(55) | Rock Hill, SC | 2,940,306 | 58,806 |
| KLDT(55) | Lake Dallas, TX | 5,229,064 | 104,581 |
| KTBU(55) | Conroe, TX | 4,719,381 | 94,388 |
| WPXE(55) | Kenosha, WI | 2,378,861 | 47,577 |
| WFXS(55) | Wittenberg, WI | 409,694 | 8,93 |
| KDOC-TV(56) | Anaheim, CA | 15,804,894 | 316,098 |
| WFSG (56) | Panama City, FL | 258,888 | 5,178 |
| WOPX(56) | Melbourne, FL | 2,638,599 | 52,772 |
| KMGH(56) | Waimanalo, HI | 876,624 | 17,532 |
| WYIN(56) | Gary, IN | 5,087,255 | 101,745 |

TABLE I
POPULATIONS WITHIN GRADE B CONTOURS
OF TV STATIONS CURRENTLY OPERATING
OR AUTHORIZED TO OPERATE ON TV CHANNELS 54, 55, OR 56
MARCH 2005
 (continued)

| <u>CALL/(CHANNEL)</u> | <u>CITY/STATE</u> | <u>POPULATION</u> 2000 CENSUS | <u>2% INTERFERENCE</u> |
|-----------------------|-------------------|----------------------------------|------------------------|
| WDKY-TV(56) | Danville, KY | 844,461 | 16,889 |
| WLVI-TV(56) | Cambridge, MA | 6,609,041 | 132,181 |
| WTVS(56) | Detroit, MI | 5,061,349 | 101,227 |
| WSPX-TV(56) | Syracuse, NY | 1,150,793 | 23,016 |
| WOLF-TV(56) | Hazleton, PA | 1,700,335 | 34,007 |
| KETK(56) | Jacksonville, TX | 645,372 | 12,907 |
| WNVC(56) | Fairfax, VA | 5,332,848 | 106,657 |
| KWDK(56) | Tacoma, WA | 3,576,332 | 71,527 |

TABLE II
POPULATIONS WITHIN NOISE LIMITED CONTOURS
OF DTV STATIONS CURRENTLY OPERATING
OR AUTHORIZED TO OPERATE ON TV CHANNELS 54, 55, OR 56
MARCH 2005

| <u>CALL/(CHANNEL)</u> | <u>CITY/STATE</u> | <u>POPULATION</u> 2000 CENSUS | <u>2% INTERFERENCE</u> |
|-----------------------|---------------------|----------------------------------|------------------------|
| KFTY(54) | Santa Rosa, CA | 1,423,996 | 28,480 |
| WEDU(54) | Tampa, FL | 4,331,098 | 86,622 |
| WGEM-TV(54) | Quincy, IL | 296,479 | 5,930 |
| WREX-TV(54) | Rockford, IL | 1,405,650 | 28,113 |
| WTTK(54) | Kokomo, IN | 2,473,810 | 49,476 |
| WGPT(54) | Oakland, MD | 504,463 | 10,089 |
| WSTM-TV(54) | Syracuse, NY | 1,512,072 | 30,241 |
| WUNE-TV(54) | Linville, NC | 1,578,644 | 31,573 |
| WPHL-TV(54) | Philadelphia, PA | 8,514,721 | 170,294 |
| WNAC-TV(54) | Providence, RI | 6,289,902 | 125,798 |
| KLDT(54) | Lake Dallas, TX | 5,152,180 | 103,043 |
| WWBT(54) | Richmond, VA | 1,291,621 | 25,832 |
| WAKA(55) | Selma, AL | 736,566 | 14,731 |
| KFMB-TV(55) | San Diego, CA | 3,149,893 | 62,998 |
| KUVI-TV(55) | Bakersfield, CA | 721,802 | 14,436 |
| KTXL(55) | Sacramento, CA | 8,986,581 | 179,732 |
| WHYY-TV(55) | Wilmington, DE | 7,088,716 | 141,774 |
| WPTV (55) | West Palm Beach, FL | 4,959,693 | 99,194 |
| KWWL(55) | Waterloo, IA | 844,506 | 16,890 |
| WHAS-TV(55) | Louisville, KY | 1,368,957 | 27,379 |
| WHAG-TV(55) | Hagerstown, MD | 2,388,645 | 47,773 |
| WGGB-TV(55) | Springfield, MA | 3,620,660 | 72,413 |
| WKAR-TV(55) | East Lansing, MI | 1,582,204 | 31,644 |
| WMAE-TV(55) | Booneville, MS | 476,321 | 9,526 |
| WENY-TV(55) | Elmira, NY | 658,800 | 13,176 |
| WNCN(55) | Goldsboro, NC | 2,869,174 | 57,383 |
| KOTV(55) | Tulsa, OK | 1,270,659 | 25,413 |
| WIPR-TV(55) | San Juan, PR | 3,740,805 | 74,816 |
| KENS-TV(55) | San Antonio, TX | 1,945,566 | 38,911 |
| WCIQ(56) | Mt .Cheaha, AL | 2,405,153 | 48,103 |
| KNXV-TV(56) | Phoenix, AZ | 3,237,294 | 64,746 |
| KTVU(56) | Oakland, CA | 7,216,955 | 144,339 |
| WCLJ-TV(56) | Bloomington, IN | 2,146,595 | 42,932 |
| KWQC-TV(56) | Davenport, IA | 1,075,405 | 21,508 |
| KDMI(56) | Des Moines, IA | 957,001 | 19,140 |
| KLFY-TV(56) | Lafayette, LA | 1,305,361 | 26,107 |

TABLE II
POPULATIONS WITHIN NOISE LIMITED CONTOURS
OF DTV STATIONS CURRENTLY OPERATING
OR AUTHORIZED TO OPERATE ON TV CHANNELS 54, 55, OR 56
MARCH 2005
 (continued)

| <u>CALL/(CHANNEL)</u> | <u>CITY/STATE</u> | <u>POPULATION</u> 2000 CENSUS | <u>2% INTERFERENCE</u> |
|-----------------------|--------------------|----------------------------------|------------------------|
| WCPB(56) | Salisbury, MD | 432,915 | 8,658 |
| WCMU-TV(56) | Mount Pleasant, MI | 716,886 | 14,338 |
| KMOV-TV(56) | St. Louis, MO | 2,878,366 | 57,567 |
| WCBS-TV(56) | New York, NY | 19,884,004 | 397,680 |
| WLOS(56) | Ashville, NC | 1,430,066 | 28,601 |
| KGFE(56) | Grand Forks, ND | 106,792 | 2,136 |
| WBGU-TV(56) | Bowling Green, KY | 1,358,392 | 27,168 |
| KJRH(56) | Tulsa, OK | 1,281,352 | 25,627 |
| WLII(56) | Caguas, PR | 3,015,042 | 60,301 |
| WBTW(56) | Florence, SC | 1,662,683 | 33,254 |
| WTVF(56) | Nashville, TN | 1,865,497 | 37,310 |
| WKNO(56) | Memphis, TN | 2,246,526 | 44,931 |
| KTBC(56) | Austin, TX | 1,030,332 | 20,607 |
| WFRV-TV(56) | Green Bay, WI | 976,272 | 19,525 |

CERTIFICATE OF SERVICE

I, Nancy St. Hilaire, do hereby certify that I have on this twenty-fifth day of March, 2005, caused a copy of the foregoing **Reply Comments of Pappas Southern California License, LLC** to be sent by first-class United States mail, postage prepaid, to the following:

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